

IN THE UNITED STATES DISTRICT COURT

FOR THE SOUTHERN DISTRICT OF NEW YORK

D. GEORGE SWEIGERT

Plaintiff,

vs.

JASON GOODMAN,

Defendant

Case No.: 1:18-cv-08653-VEC-SDA

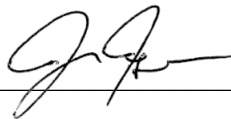
OBJECTION TO REPORT AND  
RECOMENDATION

**OBJECTION TO REPORT AND RECOMENDATION**

**VERIFICATION**

Defendant Jason Goodman Pro Se respectfully submits this Objection to Magistrate Aron's Report and Recommendation. This pleading is true and correct to the knowledge of the undersigned, except as to matters alleged on information and belief, and that as to matters that the undersigned believe are true. See N.Y.C.P.L.R. 3020. So sworn under the penalties of perjury.

Respectfully submitted November 19, 2020



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[truth@crowdsourcethetruth.org](mailto:truth@crowdsourcethetruth.org)

**OBJECTION TO REPORT AND RECOMENDATION**

Pursuant to Rule 28 U.S.C. § 636(b)(1) and Rule 72(b) of the Federal Rules of Civil Procedure, Defendant Jason Goodman Pro Se, respectfully makes the following objections to the report and recommendation. (ECF No. 164) For the reasons stated below the report should not be followed. This case should be dismissed with prejudice and the Plaintiff should be declared a vexatious litigant and denied the ability to bring future action as a Pro Se Plaintiff.

Defendant first would like to correct the court's acknowledgment of Plaintiffs false claim as stated in ECF No. 163 regarding the submission of Defendant's Opposition (ECF No.161). which Plaintiff describes as "tardy". The document was submitted timely at 1:00 pm on October 29, 2020 prior to the deadline as ordered by Magistrate Aron. To clarify, the court's website still lists normal hours for the Pro Se office as being 8:30 am to 5pm and the "new normal" Covid-19 adjusted hours as verbally explained to Goodman by courthouse staff being 8:30 am – 1pm. Goodman arrived at the courthouse prior to 1pm on October 29, 2020 but the Pro Se intake office was closed, and the door locked. Goodman knocked on the door, waited several minutes, looked around in an effort to locate a clerk and could find none. Goodman then had a short conversation with the U.S. Marshalls stationed just outside the pro Se intake office. They informed Goodman the office had closed for the day and allowed Goodman to time stamp the document at their desk, suggesting Goodman deposit it in the mail drop box at 500 Pearl. Even with several minutes delay and conversations with courthouse staff, the time stamp below Goodman's signature **(EXHIBT A)** indicates arrival at the Pro Se office prior to 1pm. The Pro Se office was inappropriately closed earlier than it should have been making it impossible to submit the document there as instructed. An additional stamp was placed on the envelope containing the document eleven minutes later at 500 Pearl as indicated **(EXHIBIT B)**. When clerks returned

OBJECTION TO REPORT AND RECOMENDATION - 2

1 the following day, additional stamps with much darker ink indicating October 30 were applied.

2 It is unreasonable for Defendant to be held accountable for court employees' lapses while  
3 reasonable for Defendant to expect the clerk's office to be open during work hours rather than  
4 closed at arbitrary times. Defendant is concerned that the court would seemingly overlook this  
5 verified fact and instead be swayed by Plaintiff's false statements which are not supported by the  
6 evidence, a recurrent theme in Plaintiff's filings throughout this matter and others.  
7

8         Sweigert is a vexatious pro se litigant in the regular practice of abusing legal process both  
9 in the courts and by making frivolous and false statements to law enforcement as a method of  
10 harassment and intimidation. **(EXHIBIT C)** Sweigert has publicly boasted of doing this in  
11 videos he habitually deletes to hide his behavior from authorities and complicate civil or criminal  
12 litigation. Sweigert's previous pleadings indicate he is aware this method affords him immunity  
13 from defamation claims and complicates admission of evidence. Sweigert publishes social  
14 media and blog posts, disguised as "news" widely publicizing his own false claims in an effort to  
15 humiliate and intimidate the target of his abuse. Sweigert does this repeatedly like a juvenile  
16 bully endeavoring to provoke a reaction. Any response or reaction is woven into further  
17 malicious claims or causes of action in vexatious suits such as in this instant legal matter. Most  
18 recently, Sweigert attempts to miscategorize a phone call Goodman had with an individual  
19 known to Goodman as Ari Friedman ("Friedman") published on YouTube as indicated in  
20 Plaintiff's letter ECF No. 163. Sweigert misrepresents the facts, indicating Friedman merely  
21 placed a phone call to Webb prior to his interview with Defendant. In fact, Friedman is a  
22 currently a close associate of Webb, producing multiple videos with Sweigert and even  
23 cohabitating with him for a time. **(EXHIBIT D)** This is yet again, another example of an  
24 individual previously unknown to Defendant, in this case Friedman, presenting himself as an  
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1 innocent third party with useful information for Goodman's news, information and entertainment  
2 broadcast, hiding the fact that he is working with Sweigert's brother and attempting to  
3 deliberately deceive Goodman. Sweigert and Webb once again appear to coordinate their efforts  
4 in an interaction intended to generate a cause of action against Goodman.  
5

6 Sweigert uses false addresses and repeatedly changes them as evidenced by his multiple  
7 change of address filings on the docket in this legal matter and the excessive amount of returned  
8 mail sent from the Court to Sweigert. On information and belief, Defendant alleges Sweigert  
9 deliberately hides his legal address and current location to avoid law enforcement and any future  
10 potential enforcement of a judgement against him. Concurrent to these actions, Sweigert  
11 deliberately publicizes Defendant's home and business address in conjunction with manipulated  
12 photos and false statements, falsely associating Defendant with horrifying, racist statements as  
13 indicated in ECF No. 161. This behavior is so egregious given the current climate of civil unrest  
14 and random violence against perceived racists it simply cannot be ignored. Sweigert continues  
15 to deliberately place the Defendant in real danger with his false statements and malicious  
16 publications. Ill-informed individuals who might view Sweigert's public blog or video posts  
17 could easily be prompted to take violent action, and could identify Goodman at his home or  
18 elsewhere in New York City or other locations as frequently occurs during Goodman's live video  
19 broadcasts (<https://youtu.be/a-KuMJfvZFA>) (EXHIBIT E). These actions are so egregious and  
20 place Goodman in such extreme, immediate risk of substantial harm or even death, the court  
21 MUST use its substantial powers to take action preventing Sweigert from continuing this pattern  
22 and practice of behavior.  
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26 This is NOT a legitimate suit brought for a legitimate purpose. This lawsuit represents a  
27 brazen abuse of process and it must not be allowed to proceed. Sweigert has brought this lawsuit  
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1 for an improper purpose and in bad faith and for those reasons alone it should be dismissed  
2 pursuant to the unclean hands doctrine. Rather than seeking to cure a legitimate injury, Sweigert  
3 proceeds deliberately and persistently in an attempt to destroy Defendant's ability to conduct  
4 business and peacefully go about his daily life. NYPD has told Defendant Sweigert's  
5 harassment is insufficiently urgent and their resources spread too thin for them to pursue the  
6 matter. The FBI has likewise refused to intervene despite Sweigert's interstate efforts, the use of  
7 mail, phones and the internet. If the court should allow this case to proceed, it would be  
8 demonstrating tacit approval of Sweigert's abuse of process and in fact encouraging Sweigert's  
9 threats, intimidation and wanton attacks on Goodman. Sweigert's numerous public statements  
10 and actions cause Defendant to believe he is mentally unstable and an immediate, dangerous  
11 threat to Defendant's safety. Only such a disturbed individual would choose to spend his days  
12 attacking and harassing the Defendant in every conceivable manner, rather than tending to his  
13 own son who he claims is handicapped.

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17 Sweigert was totally unknown to Defendant and Goodman never spoke about or knew of  
18 Sweigert prior to Sweigert's deliberate provocation via menacing, threatening videos, tweets and  
19 other social media postings and emails that have been previously referenced in these pleadings  
20 (<https://www.bitchute.com/video/Hz1tRwyu22FW/>). In that video posted on or about June 15,  
21 2017 Sweigert states *"let's talk about Jason Goodman and Trish whatever her name is Patricia*  
22 *rogaine I don't know what her name is but I'm going to tell you something right now I'm going*  
23 *to launch a crowdsourcing investigation to put you two assholes in jail for what you did to my*  
24 *brother all right Jason."* Full transcript of this vindictive rant is included. **(EXHIBIT F)**  
25 Sweigert enunciates his intention, revenge for what he perceives Goodman has done to his  
26 brother. The name Patricia rogain refers to Patricia Negron ("Negron") previously a co-  
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1 defendant in Steele v Goodman. Sweigert frequently mispronounces or otherwise “forgets” the  
2 real name of individuals he would benefit from claiming no association with. On information  
3 and belief, Defendant alleges Steele v Goodman is another coordinated, vexatious suit brought  
4 against Goodman in which Goodman alleged Negron was in fact working with Plaintiff against  
5 Goodman. Negron was dismissed from Steele v Goodman when she reached a confidential  
6 settlement with the Plaintiff, likely for zero dollars. Sweigert and Webb both feature  
7 prominently in Steele v Goodman. Negron was also unknown to Goodman until just a few days  
8 prior to Sweigert’s posting of the threatening June 15 video, conveniently or possibly  
9 coincidentally, Webb introduced Negron to Goodman. Just on the surface level, without  
10 investigation any reasonable person can see that each of these individuals are either related to  
11 one another, have prior relationships with one another or at least communicate with one another  
12 and have surrounded Goodman to play roles in the various lawsuits Sweigert has either brought  
13 against Goodman or attempted to intervene in. With his direct threat, Sweigert deliberately drew  
14 Defendant into a conflict so he could sue for alleged money damages and extort and abuse the  
15 Defendant. Regarding issues of controversy in this legal matter that are also controversy in  
16 Steele v Goodman in the EDVA Richmond division, the honorable M Hannah Lauck said in a  
17 Show Cause hearing on July 15, 2020 *“I cannot believe that this has come into a federal court,*  
18 *frankly. This is a spitting contest.”* **(EXHIBIT G)** Shortly after making that statement, Judge  
19 Lauck dismissed the matter in the Eastern District of Virginia further stating *“Now, I want to*  
20 *address whether or not either party should consider engaging in another standoff. I would want*  
21 *to -- it would have to be here, and it would have to be in my court.”* **(EXHIBIT H)** Plaintiff  
22 Sweigert is a participant in and is seeking to perpetuate that spitting contest both here in the  
23 Southern District of New York, and in Virginia having twice attempted to intervene in the  
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1 matter. In defiance of Judge Lauck's order, the case was refiled by Steele the VA Plaintiff in the  
2 Alexandria division where Sweigert has attempted once again unsuccessfully to intervene.

3 **(EXHIBIT I)**

4  
5 On October 24, 2020 Sweigert sent an email to Jonathan Snyder, **(EXHIBIT J)**  
6 Defendant's attorney in The National Academy of Television Arts and Sciences, Inc. et al v.  
7 Multimedia System Design, Inc. indicating Sweigert's intention to intervene in that case. The  
8 letter refers to the incident provoked by Friedman, furthering Defendant's belief that Friedman  
9 was deliberately sent to deceive Goodman. Even if there was no prior intent, Sweigert  
10 opportunistically seized on this knowing that Goodman has been forced by NATAS to hire an  
11 attorney due to their underhanded tactics. NATAS took action against Goodman personally with  
12 regard to YouTube, but then sued Goodman's corporation which does not own the YouTube  
13 channel in question. YouTube as a third-party arbitrator agreed this was unjust and reinstated  
14 Goodman's YouTube channel on the basis of that argument. Suing Goodman's corporation  
15 however prevents Goodman from defending the case Pro Se putting great financial burden on the  
16 Defendant. The mere act of causing Goodman's attorney to read Sweigert's baseless letter and  
17 discuss it with Goodman has resulted in increased legal fees and further deliberate financial  
18 punishment for Goodman. This action furthers Defendant's belief that NATAS was originally  
19 provoked by Sweigert, resulting in yet another frivolous suit. At very least, it again indicates  
20 Sweigert's opportunistic approach to seize on any and every opportunity to harass and  
21 antagonize Goodman without due cause. In the interest of justice, and the preservation of its  
22 own judicial resources and those of New York State taxpayers, Sweigert's claims must be  
23 dismissed if only pursuant to the unclean hands doctrine, but also as a result of his deliberate,  
24 persistent and ongoing abuse of process.  
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OBJECTION TO REPORT AND RECOMENDATION - 7

1 No person should be allowed to hold honest citizens or the courts hostage with this type  
2 of vexatious, resource draining litigation, it simply cannot stand. Under the “new normal” of  
3 Covid-19 malignant litigants such as Sweigert are no longer deterred by the costs of travel as  
4 civil hearings have now become almost exclusively telephonic. This new normal gives abusive  
5 individuals like Sweigert free reign to endlessly overwhelm the courts and their perceived  
6 enemies with their endless vexatious filings in pursuit of baseless personal vendettas.  
7 Individuals like the Defendant who find themselves unable to finance adequate legal defense  
8 against such unjustified attacks are at the mercy of potentially psychopathic individuals with  
9 marginal understanding of the law sufficient to enter pleadings in the way Sweigert has.  
10

11  
12 Sweigert has repeatedly attempted to conflate the actions and behavior of his brother,  
13 George Webb Sweigert with Goodman and take action against Goodman in court and through  
14 other means as a result of those actions. An early example of this occurred November 28, 2017.  
15 Sweigert sent an email (**EXHIBIT K**) to multiple third parties including Webb alleging that  
16 Goodman was involved in human trafficking. The allegation is totally false and the only  
17 evidence Sweigert bases the allegation on are statements made by his own brother. On  
18 information and belief, Defendant alleges this claim was made in an effort to pursue information  
19 about Goodman’s personal life and his use of internet dating applications. Goodman has never  
20 engaged with underage minors and has never done anything illegal or inappropriate with respect  
21 to online dating services. Defendant believes this was merely an attempt to introduce material  
22 through discovery that could be further used to harass and embarrass Defendant. As now  
23 revealed in Plaintiff’s interrogatories, indeed such information is being sought by Plaintiff  
24 despite being totally irrelevant, and wholly unrelated to any matters in this legal action.  
25 Defendant is aware this particular statement is well outside the statute of limitations; it is  
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presented here only as an example of the egregious behavior Plaintiff has perpetuated over the past three years and to demonstrate the persistent pattern and practice that is ongoing today. There are far too many similar occurrences for Defendant to burden the court by including all, however on April 28, 2020 Sweigert sent an email (**EXHIBIT L**) to multiple third parties including Webb and Colin Sullivan chief legal counsel for Patreon. The subject was "*Latest update on George Webb*" In the email, Sweigert attempts to associate Goodman with Webb and attribute bad actions taken by Webb to Goodman. Webb was apparently removed from YouTube possibly at the behest of CNN, due to false statements he made about a third party as reported by CNN. For unknown reasons, Sweigert found it appropriate to alert Patreon to this development and include Goodman despite the fact that Goodman has no involvement in the matter. Patreon is Goodman's primary source of income and contacting their legal department with regard to matters Goodman has no involvement with is not a legitimate communication but rather a naked attempt to provoke Patreon to terminate its business relationship with Goodman. Surely at a certain point, any company could determine too much legal action related to any particular individual might render that person a liability and cause the entity to cease doing business with them. Goodman associated with Webb only for a brief period of approximately three months in 2017. Sending updates of activity related to this third party to Goodman's business associates or their legal departments is not appropriate. Goodman terminated all interactions with Webb years ago and has no involvement in his activities or interest in updates about them. Goodman does not interact or communicate with Webb any longer and had no role in the matters referenced in the email. Webb is an additional third party Sweigert published the claims to in the email. As reported by CNN, Webb's most recent snafu involves false claims alleging a U.S. Army reservist named Maatje Benassi was Covid-19 patient zero. According to

1 Benassi's statements to CNN, the false claims published and republished by the Sweigert  
2 brothers ruined her life resulting in death threats and huge legal costs. While this is remarkably  
3 similar to the efforts Goodman alleges the Sweigerts have also directed at him, Goodman knows  
4 nothing about Benassi outside the information reported on CNN. Goodman was unaware of  
5 Webb's claim or anything to do with the matter, prior to reading the report on CNN.com. On  
6 October 31, 2020 Webb filed suit as a Pro Se Plaintiff against CNN. **(EXHIBIT M)** On  
7 November 6, 2020 Sweigert filed a motion seeking to intervene and to transfer venue to the  
8 SDNY, **(EXHIBIT N)** on the basis that Sweigert believes Webb's vexatious suit against CNN  
9 should also include Goodman. Goodman believes Sweigert will attempt to clog Judge Caproni's  
10 docket with further vexatious filings in this matter. The Sweigert brothers' efforts to make  
11 vexatious litigation a family affair could not be more transparent and are unlikely to end unless  
12 the court intervenes to put a stop to this ongoing brazen abuse of process. Communications  
13 containing false accusations including the email Sweigert sent to parties at Patreon.com have  
14 severely compromised Goodman's ability to communicate with Patreon. Goodman previously  
15 had a good relationship with and productive interactions with Patreon CEO Jack Conte. Conte  
16 no longer returns Goodman's emails and during an in-person conversation in Los Angeles in  
17 2018, Conte specifically referenced this legal matter as the reason for restricting communication.  
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22 Should the court decide to allow this matter to proceed, Goodman respectfully requests a  
23 Show Cause hearing and prays the court will compel Sweigert to appear in person, with  
24 appropriate court mandated Covid-19 PPE so he may answer under oath, penalty of perjury and  
25 contempt of court as to why the court should not dismiss this matter with prejudice and declare  
26 him a vexatious litigant.  
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**CONCLUSION**

For the reasons stated above the Defendant respectfully request the court with not adopt Magistrate Aron's Report and Recommendation, but rather dismiss this matter with prejudice and serve justice by declaring Sweigert a vexatious litigant and remove his ability to bring future action as a Pro Se Plaintiff.

Respectfully submitted November 19, 2020



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**(EXHIBIT A)**

DEFENDANT'S OPPOSITION TO PLAINTIFF'S NOTICE OF AMENDMENT  
DEFENDANT'S COUNTERCLAIM PAPERS (DKT. 145) PURSUANT TO  
STATE A CAUSE, OR, IN THE ALTERNATIVE, RULE 12(B)(L) LACK

2020 OCT 29 PM 1:00

COURT OF APPEALS  
SECOND CIRCUIT  
VIA DEPOSITORY

Signed this 29<sup>th</sup> day of October 2020

Ja

**(EXHIBIT B)**

Jason Goodman  
252 7th Ave #65  
NYC 10001

FOR DOMESTIC AND INTERNATIONAL USE  
PLACE MAILING LABEL HERE

Pro Se withel  
500 Pearl St  
NY NY 10007

USPS  
NEW YORK



GUARANTEED DELIVERY DATE\*



GUARANTEED DELIVERY TIME†



USPS TRACKING™ INCLUDED



INSURANCE INCLUDED



PICKUP AVAILABLE



SIGNATURE INCLUDED UPON REQUEST

\* Money Back Guarantee to U.S., select APO/FPO/DPO, and select International destinations. See DMM and IMM at [pe.usps.com](http://pe.usps.com) for complete details.

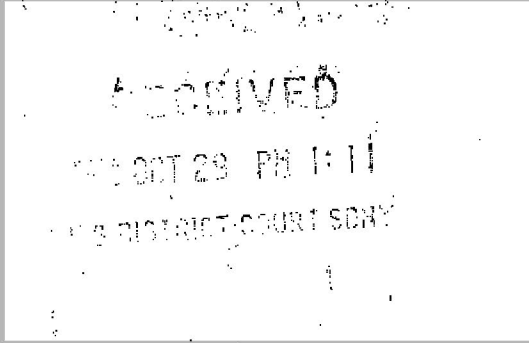
† Money Back Guarantee for U.S. destinations only.



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ORDER FREE SUPPLIES ONLINE



UNITED STATES  
POSTAL SERVICE.



**(EXHIBIT C)**



**From:** Spoilation Notice [spoliation-notice@mailbox.org](mailto:spoliation-notice@mailbox.org)

**Subject:** Re: Identity of person calling Dr. Fauci's home unlisted number may have been identified

**Date:** March 30, 2020 at 10:54 AM

**To:** [clane@niaid.nih.gov](mailto:clane@niaid.nih.gov), [haugwelt@niaid.nih.gov](mailto:haugwelt@niaid.nih.gov), [deaweb@niaid.nih.gov](mailto:deaweb@niaid.nih.gov), [rpurcell@niaid.nih.gov](mailto:rpurcell@niaid.nih.gov), [niaidtraining@nih.gov](mailto:niaidtraining@nih.gov), [LL153p@nih.gov](mailto:LL153p@nih.gov), [NIAIDSBIR@mail.nih.gov](mailto:NIAIDSBIR@mail.nih.gov), [Annie.grimes@nih.gov](mailto:Annie.grimes@nih.gov), [anthony.fauci@nih.gov](mailto:anthony.fauci@nih.gov), Spoilation Notice [spoliation-notice@mailbox.org](mailto:spoliation-notice@mailbox.org)

**Cc:** [Brittany.Custer@ic.fbi.gov](mailto:Brittany.Custer@ic.fbi.gov), [nyspmail@troopers.ny.gov](mailto:nyspmail@troopers.ny.gov), [legal@patreon.com](mailto:legal@patreon.com), [colin@patreon.com](mailto:colin@patreon.com), [txjic@dps.texas.gov](mailto:txjic@dps.texas.gov), [tip@dps.texas.gov](mailto:tip@dps.texas.gov), [tcic@dps.texas.gov](mailto:tcic@dps.texas.gov), [crimestatsinfo@ic.fbi.gov](mailto:crimestatsinfo@ic.fbi.gov), [NICS@ic.fbi.gov](mailto:NICS@ic.fbi.gov), [nicc\\_nicc@hq.dhs.gov](mailto:nicc_nicc@hq.dhs.gov), [iso@ic.fbi.gov](mailto:iso@ic.fbi.gov), [nysag@ag.ny.gov](mailto:nysag@ag.ny.gov), [truth@crowdsourcethetruth.org](mailto:truth@crowdsourcethetruth.org), [jason@21stcentury3d.com](mailto:jason@21stcentury3d.com), [jasongoodman72@protonmail.com](mailto:jasongoodman72@protonmail.com)

To: Jason Goodman

I have observed your recent comment to a YouTube video (attached).

This message makes certain parties aware that you are an alleged associate of the subject of the article "MONTEGRAPH" (see web page 1 below).

Apparently you have made telephone calls to Dr. Tammy Parry via the use of an alleged unlisted number. Social media rumors indicate you obtained this phone number from "MONTEGRAPH" (see web page 2 below).

<https://sdny.news/2020/03/29/new-york-city-braces-for-covid-19-black-death-mass-die-off-with-45-refrigerator-truck-trailers-to-store-3600-corpses/>

<https://sdny.news/2020/03/18/jason-goodman-films-patients-at-nycs-presbyterian-hospital-while-accused-by-montana-physician-of-obtaining-private-telephone-number-to-interfere-with-patient-care/>

D. George Sweigert  
Evidence Collection Team



**Jason Goodman** 51 minutes ago

I thought you were an EMT, if this is a national emergency shouldn't you be occupier driving around saving people rather than making insane videos about how you miss sleeping in dog excrement where your father who obviously knew your true value yo made you sleep



REPLY

**(EXHIBIT D)**

Webb and Friedman pictured together in one of their recent videos that has since been removed from the internet.




**(EXHIBIT E)**

A friendly viewer and fan of Goodman's broadcasts recognizes Goodman in a dense crowd on the streets of Washington D.C.

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FOR LEGAL PROFESSIONALS

YouTube

Search



23:21 / 3:24:57

**CROWDSOURCE THE TRUTH**

America in Existential Crisis a the Legal Battle for the White House Rages On

10,814 views • Streamed live on Nov 14, 2020

1K 14 SHARE SAVE

**Crowdsource the Truth 2**  
26.2K subscribers

ANALYTICS EDIT VIDEO

Up next

Top chat replay

- kernowed
- Spirit Child Where's Bis hear him say "blaaaack
- Wild Man go find and ir
- Pam Ronning Jass did
- Lloyd Braun Good to se
- Catania Momma Italia ignorance
- Thomas Tyson cool, Je
- JC Hasty after rally che
- Brian Mcnamara No m
- kernowed Alex was on somewhere
- Tyler G vindication Jas
- Miriam Peterson DIBA
- Huffman Aviation yay
- Tyler G you are loved
- average prepper Jason EoW boys

HIDE CHA

**(EXHIBIT F)**

SWEIGERT JUNE 15, 2017 VIDEO TRANSCRIPT

0:00:00.320,0:00:05.280  
everybody uh this is dave checking in um

0:00:06.080,0:00:11.280  
now that my resume is public knowledge

0:00:08.960,0:00:12.559  
yeah i have a bad acting reel so what

0:00:11.280,0:00:14.240  
you know when you're in la

0:00:12.559,0:00:15.679  
everybody says they're an actor it's

0:00:14.240,0:00:17.279  
like when you go to memphis everybody

0:00:15.679,0:00:19.359  
says they're a songwriter

0:00:17.279,0:00:20.560  
give me a break taxi cab drivers say

0:00:19.359,0:00:23.600  
they're actors

0:00:20.560,0:00:27.599  
oh he's part of a c.i.a actor elite

0:00:23.600,0:00:27.599  
that's run by scientology to keep

0:00:29.760,0:00:36.079  
however what my resume

0:00:33.040,0:00:37.600  
demonstrates to most of you is that i

0:00:36.079,0:00:39.120  
really know my stuff when it comes to

0:00:37.600,0:00:41.600  
electronic evidence

0:00:39.120,0:00:44.160  
and federal law and the violations of

0:00:41.600,0:00:46.239  
federal law

0:00:44.160,0:00:48.160

so let's talk about jason goodman and

0:00:46.239,0:00:50.000

trish whatever her name is patricia

0:00:48.160,0:00:51.039

rogaine i don't know what her name is

0:00:50.000,0:00:52.320

but i'm going to tell you something

0:00:51.039,0:00:54.079

right now i'm going to launch a

0:00:52.320,0:00:56.079

crowdsourcing investigation

0:00:54.079,0:00:58.719

to put you two assholes in jail for what

0:00:56.079,0:01:00.640

you did to my brother all right jason so

0:00:58.719,0:01:03.440

you want a reality show

0:01:00.640,0:01:06.159

larping around live action reality

0:01:03.440,0:01:08.080

you're gonna get it right now

0:01:06.159,0:01:10.000

because i think i can prove to a

0:01:08.080,0:01:11.600

prosecutor that you broke the law i know

0:01:10.000,0:01:12.960

i can prove to a prosecutor that you

0:01:11.600,0:01:15.759

broke new york state law

0:01:12.960,0:01:17.520

with your stupid privacy stunt that

0:01:15.759,0:01:20.560

started this entire nightmare

0:01:17.520,0:01:22.720

called the seth rich files who spoofed

0:01:20.560,0:01:24.240



the seth rich files remember that jason

0:01:22.720,0:01:26.479

remember when you were screaming

0:01:24.240,0:01:29.200

hysterically at the camera

0:01:26.479,0:01:30.680

which by the way go watch the mr cat eye

0:01:29.200,0:01:34.000

video

0:01:30.680,0:01:36.960

m-r-c-a-t-i it's an hour long

0:01:34.000,0:01:39.200

he explains the whole process and how

0:01:36.960,0:01:40.960

you fit into it jason and how you fit

0:01:39.200,0:01:43.520

into a trish

0:01:40.960,0:01:45.040

so you want to start exposing people

0:01:43.520,0:01:48.399

guess who we're going to expose

0:01:45.040,0:01:50.399

jason and trish now i have a couple of

0:01:48.399,0:01:52.240

allies besides the legal community

0:01:50.399,0:01:54.159

because as you know jason i'm an expert

0:01:52.240,0:01:57.280

when it comes to expert testimony

0:01:54.159,0:01:58.560

about data privacy and internet security

0:01:57.280,0:02:00.479

and i'm one of the most highly

0:01:58.560,0:02:02.240

credentialed people in the united states

0:02:00.479,0:02:04.799

and yes i did work for the national

0:02:02.240,0:02:06.479  
security agency as a technical expert

0:02:04.799,0:02:08.080  
and yes i did work for special

0:02:06.479,0:02:10.640  
operations as a technical

0:02:08.080,0:02:12.400  
expert and yes i work many many many

0:02:10.640,0:02:14.959  
jobs as a technical expert

0:02:12.400,0:02:16.239  
at the legal points and the technology

0:02:14.959,0:02:18.239  
points

0:02:16.239,0:02:20.160  
very few people can bridge these things

0:02:18.239,0:02:22.800  
and i've had many attorneys

0:02:20.160,0:02:25.040  
tell me remarkable work tremendous work

0:02:22.800,0:02:26.959  
i've never seen anything like this

0:02:25.040,0:02:29.440  
and now jason you're gonna go find an

0:02:26.959,0:02:31.519  
attorney to read my stuff

0:02:29.440,0:02:33.920  
and we'll play this little game because

0:02:31.519,0:02:36.319  
my brother sits in a jail

0:02:33.920,0:02:37.519  
and you have given him a complete mind

0:02:36.319,0:02:39.519  
fuck

0:02:37.519,0:02:41.200

and now when he probably believed in you

0:02:39.519,0:02:43.920

and you told the world he was your best

0:02:41.200,0:02:45.200

friend in life you just abandoned him

0:02:43.920,0:02:46.640

well you're not going to do that to my

0:02:45.200,0:02:49.200

brother

0:02:46.640,0:02:51.360

and your little troll squad has already

0:02:49.200,0:02:52.160

destroyed my career so let's just use my

0:02:51.360,0:02:54.800

career for new

0:02:52.160,0:02:56.560

summer project let's crowd source all

0:02:54.800,0:03:00.879

the information we need to put

0:02:56.560,0:03:02.239

trish and jason in jail let's do that

0:03:00.879,0:03:04.239

and you know what i bet you i can get

0:03:02.239,0:03:05.840

the maritime people behind me i bet i

0:03:04.239,0:03:07.680

can get the coast guard behind me i bet

0:03:05.840,0:03:08.080

you i can get the seafarers union behind

0:03:07.680,0:03:10.159

me

0:03:08.080,0:03:12.000

the mayor of charleston the governor of

0:03:10.159,0:03:14.239

charleston everybody's going to be

0:03:12.000,0:03:16.400

behind me you stupid asshole for what

0:03:14.239,0:03:18.080  
you did to my brother

0:03:16.400,0:03:19.519  
you could have intervened you've could

0:03:18.080,0:03:21.599  
have helped them and you just let them

0:03:19.519,0:03:23.360  
go off the deep end

0:03:21.599,0:03:24.879  
and we had guys like you in the military

0:03:23.360,0:03:27.360  
you know what jason they all wound up in

0:03:24.879,0:03:29.280  
body bags and became oil stains

0:03:27.360,0:03:30.799  
so we know all about your kind and you

0:03:29.280,0:03:33.040  
know here's the problem jason

0:03:30.799,0:03:34.640  
go call all your hollywood friends and

0:03:33.040,0:03:36.799  
i'll talk to them and say hey we're

0:03:34.640,0:03:39.280  
going to make a lot of money on this

0:03:36.799,0:03:41.920  
jason's dead meat don't you want to get

0:03:39.280,0:03:43.280  
into our patreon account

0:03:41.920,0:03:44.720  
well there's a lot of people out there

0:03:43.280,0:03:47.519  
that want to start doing radio

0:03:44.720,0:03:49.120  
interviews with me hey defango wink wink

0:03:47.519,0:03:50.560

don't miss your big opportunity for

0:03:49.120,0:03:53.920  
about 2 000 people

0:03:50.560,0:03:56.239  
on a live stream so max egan

0:03:53.920,0:03:56.959  
who got screwed over by george webb

0:03:56.239,0:03:59.680  
because max

0:03:56.959,0:04:00.239  
egan interviewed my brother and linda

0:03:59.680,0:04:02.879  
west

0:04:00.239,0:04:04.319  
and possibly truther girls and possibly

0:04:02.879,0:04:06.239  
richie from boston

0:04:04.319,0:04:08.319  
we all are thinking about doing a show

0:04:06.239,0:04:11.360  
and that includes agent 19

0:04:08.319,0:04:13.200  
and that includes montegraph

0:04:11.360,0:04:14.480  
because monograph i know your agenda and

0:04:13.200,0:04:15.200  
i know what you want to accomplish it

0:04:14.480,0:04:18.639  
but the way

0:04:15.200,0:04:21.040  
through that agenda is jason goodman

0:04:18.639,0:04:21.759  
and trish whatever the hell her name is

0:04:21.040,0:04:23.360  
rogaine

0:04:21.759,0:04:24.880

and you know what jason i'm going to

0:04:23.360,0:04:27.360  
make i'm going to make a

0:04:24.880,0:04:28.240  
convincing argument to a prosecutor in

0:04:27.360,0:04:30.400  
new york

0:04:28.240,0:04:32.320  
that that video you did about the fango

0:04:30.400,0:04:34.080  
is inciting violence

0:04:32.320,0:04:36.479  
and we're going to see what a jury in

0:04:34.080,0:04:38.639  
new york has to say about your opinions

0:04:36.479,0:04:39.520  
or maybe we'll go to arizona what do you

0:04:38.639,0:04:40.320  
think about that

0:04:39.520,0:04:42.800  
but i'm going to tell you something

0:04:40.320,0:04:44.960  
right now i believe based on my

0:04:42.800,0:04:46.720  
technical background and my experience

0:04:44.960,0:04:49.040  
and my knowledge of federal laws

0:04:46.720,0:04:51.360  
i'm going to make an educated guess that

0:04:49.040,0:04:52.560  
this little file transfer game that you

0:04:51.360,0:04:54.400  
played around with

0:04:52.560,0:04:56.080  
i think you broke federal law and i

0:04:54.400,0:04:58.240

think you broke state law and i don't

0:04:56.080,0:05:00.240

think you want anybody to talk about it

0:04:58.240,0:05:01.840

so why don't we put the focus back on

0:05:00.240,0:05:04.800

jason and trish

0:05:01.840,0:05:06.320

and their use of electronic files and

0:05:04.800,0:05:08.800

transporting electronic

0:05:06.320,0:05:10.479

files across state lines for the sole

0:05:08.800,0:05:13.280

intent of distributing them to

0:05:10.479,0:05:14.560

unknowing and unwitting participants and

0:05:13.280,0:05:16.800

there's conspiracy

0:05:14.560,0:05:18.880

and trish was on her live stream today

0:05:16.800,0:05:20.560

talking about rico

0:05:18.880,0:05:22.880

hey listen trish do you want to play

0:05:20.560,0:05:23.759

rico we can put a rico case together for

0:05:22.880,0:05:26.560

this

0:05:23.759,0:05:27.120

not a problem not a problem and you know

0:05:26.560,0:05:28.880

what

0:05:27.120,0:05:31.039

linda west and i already went through

0:05:28.880,0:05:32.479

that we had to put a rico case together

0:05:31.039,0:05:34.160  
against dallas goldbug

0:05:32.479,0:05:35.919  
that's why he's disappeared into the

0:05:34.160,0:05:37.440  
night so you know what we'll just dust

0:05:35.919,0:05:39.440  
that off and put your names on it and

0:05:37.440,0:05:41.120  
see how it works on you

0:05:39.440,0:05:43.039  
okay because you're not going to come

0:05:41.120,0:05:44.720  
around and try to push your way into

0:05:43.039,0:05:45.280  
this community that's been built up over

0:05:44.720,0:05:47.919  
the last

0:05:45.280,0:05:49.680  
decade and take a big massive defecation

0:05:47.919,0:05:52.160  
on my brother's reputation

0:05:49.680,0:05:54.240  
and my reputation by the way and walk

0:05:52.160,0:05:56.639  
away after you shut down

0:05:54.240,0:05:58.639  
indirectly or directly participating or

0:05:56.639,0:06:00.479  
unparticipating in some manner

0:05:58.639,0:06:01.919  
you shut down one of the busiest ports

0:06:00.479,0:06:04.880  
in the united states

0:06:01.919,0:06:06.319



in a terroristic activity and i also

0:06:04.880,0:06:08.400

think homeland security is going to be

0:06:06.319,0:06:10.400

very interested in understanding more

0:06:08.400,0:06:15.120

about these tactics

0:06:10.400,0:06:15.120

so have fun jason and trish

**(EXHIBIT G)**

1 introducing something into evidence. I can strike an  
2 entire pleading. I can stay the case until the order is  
3 obeyed. And I can also dismiss the action in whole or in  
4 part or render default judgment against the disobeying  
5 party.

6 So I want you to be aware that I am considering  
7 every option under Rule 37, given that we have taken two  
8 years to essentially get nowhere. It is a huge waste of  
9 judicial resources and time and money.

10 And in case you haven't figured it out, you're  
11 never going to agree on what happens. It's never going to  
12 happen. So just show me what you think happened. And you  
13 can't get mad at each other anymore. It's a defamation  
14 case. It's a defamation case. You guys think you are  
15 saying nasty things about each other on the Internet. I  
16 cannot believe that this has come into a federal court,  
17 frankly. This is a spitting contest. But it's here, and  
18 -- but it's not going to come here in a manner that does  
19 not follow the orderly and appropriate rules that I  
20 issue, my orders, and our local rules, and the federal  
21 rules. Do you all understand you are under notice?

22 MR. GOODMAN: Yes.

23 THE COURT: And I've told you what I'm concerned  
24 about?

25 MR. GOODMAN: Yes.

**(EXHIBIT H)**

1 that there's just no case to present, and we are just  
2 weeks away from when a trial was supposed to commence.

3 Now, I want to address whether or not either  
4 party should consider engaging in another standoff. I  
5 would want to -- it would have to be here, and it would  
6 have to be in my court. But I would want to advise  
7 you-all that given the level of rancor that has been  
8 demonstrated by all sides, I'm first going to issue a stay  
9 of 45 days before entering the dismissal with prejudice.

10 So, the case will be stayed, and then I'm going  
11 to issue a dismissal without prejudice. And I am saying  
12 that the parties must stand down and cease filing, much  
13 less file anything improper in this case.

14 Now, should they want to talk about resolving  
15 the case during this time, that is the perfect opportunity  
16 to do so. And as I said, the dismissal will commence  
17 regardless of whether or not the case is resolved.

18 So I am imposing the stay not too invite input.  
19 I have warned the parties of sanctions likely too many  
20 times without actually imposing them. But to require the  
21 parties to contemplate their actions, future and past,  
22 with regard to this case, and I mean also counsel for  
23 plaintiffs, it's dismissed because plaintiffs failed to  
24 build a case even after two years. And there have been,  
25 by my count, at least nine violations of federal rules in

**(EXHIBIT I)**

IN THE UNITED STATES DISTRICT  
COURT FOR THE EASTERN  
DISTRICT OF VIRGINIA  
Alexandria Division

ROBERT DAVID STEELE, et al.,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	Civil Action No. 1:20-cv-01140(RDA/IDD)
	)	
JASON GOODMAN,	)	
	)	
Defendant.	)	
<hr style="width: 30%; margin-left: 0;"/>	)	

**ORDER**

This MATTER is before the Court on non-party D. George Sweigert’s Motion for Leave to Intervene Pursuant to Rule 24(a) [Dkt. No. 4] (hereinafter “Motion”). This matter can be resolved without oral argument, as such argument would not aid the decisional process. It is hereby

**ORDERED** that the Motion is **DENIED**. The Motion is denied because Intervenor-Applicant Sweigert failed to meet the requirements for both intervention of right and permissive intervention under Rule 24.

The Court must permit a person to intervene if a federal statute affords him the right unconditionally or if he claims an interest in the subject matter of the case and his interest would not be adequately represented by existing parties. *See* FED. R. CIV. P. 24(A). The movant cites no statute or legal authority that would provide him a cause of action as an intervenor. *See* Fed. R. Civ. P. 24(a)(1). The movant also lacks an interest in the subject matter of this case. On September 28, 2020, Plaintiffs Robert David Steele and his nonprofit filed a Complaint against Defendant Jason Goodman for, among other things, defamation and

unauthorized use of Steele’s name and picture. Compl. at 1, Dkt. No. 1. Plaintiffs seek an injunction to permanently enjoin and order Goodman to cease and desist from any further use of Steele’s name and picture and to remove such from Defendant’s online videos, tweets, blogs and posts. Dkt. No. 7 ¶1. Sweigert claims to have an interest in the litigation because the complaint mentions him. Dkt. No. 4 ¶4. However, paragraph 50 of the Complaint, the only place where Sweigert is mentioned, describes a video Plaintiffs allege Defendant produced and the footnote to the paragraph merely identifies Sweigert as one of the people besides Steele whose photoshopped image was depicted in the video. Compl. ¶50. This is insufficient for Sweigert to establish an interest in the case. *See Steele v. Goodman*, 2019 U.S. Dist. LEXIS 124571, \*18, 2019 WL 3366556 (E.D. Va. July 25, 2019) (a passing mention in the complaint does not establish a connection between the harm Plaintiffs allege and the harm Sweigert alleges). Sweigert has not established that he has an interest in the online posts targeted at Steele or in Steele’s claims. Furthermore, a final judgment in Steele’s action will not impair Sweigert’s ability to pursue independent claims against Goodman.

The movant, likewise, fails to meet the requirements for permissive intervention. The Court may permit a person to intervene in an action if he has, pursuant to a federal statute, a conditional right to intervene or has a claim that overlaps with the action based on “common question of law or fact.” *See* FED. R. CIV. P. 24(B). Like Steele, Sweigert claims that Defendant Goodman has defamed him through Internet videos and social media posts. Dkt. No. 4 at ¶i. Sweigert and Steele may have similar causes of action against Goodman, but that does not mean the movant may intervene in a case that is strictly about false and defamatory statements allegedly published by Goodman about Steele. “To the extent that Sweigert’s claims seem ‘identical’ to Steele’s, the claims relate to two distinct sets of conduct or statements: those



directed at Plaintiffs and those directed at Sweigert.” *Steele*, 2019 U.S. Dist. LEXIS 124571, \*18. The facts underlying both claims of defamation differ. *Id.* at \*24. In their memorandum in opposition to the Motion, Plaintiffs argue that they have no relationship, business or personal, with Sweigert, and they have no knowledge or involvement with the defamation allegedly perpetrated by the Defendant against the movant. Dkt. No. 7 ¶5, footnote 1. Sweigert likewise argues there is no relationship between him and Plaintiffs. Dkt. 4, ¶5. Thus, movant fails to establish a common question of law or fact.

Sweigert notes that during previous litigation involving Steele and Goodman, Defendant defamed him over social media with claims that Sweigert is an operative of Steele’s. Sweigert seeks status as a “limited plaintiff for the primary purposes of obtaining a legal determination from this Court that,” since June 14, 2017, “the movant has had nothing to do with any business, litigation, operations, or any other such activity” with Plaintiffs. Dkt. No. 4 ¶5. No allegations have been made in this case that Sweigert is connected to Steele. Dkt. No. 7 ¶7. Movant essentially seeks an advisory opinion from the Court concerning his involvement in a previous case or an advisory opinion concerning claims that are not the subject of litigation and would thus have no effect. The Court will not provide an advisory opinion. “A federal court has neither the power to render advisory opinions nor ‘to decide questions that cannot affect the rights of litigants in the case before them.’” *Ragan v. Vosburgh*, No. 96-2621, No. 96-2687, No. 96-2739, 1997 U.S. App. LEXIS 6626, at \*13 (4th Cir. Apr. 10, 1997).

ENTERED this 5<sup>th</sup> day of November 2020.

/s/ Ivan D. Davis

Ivan D. Davis  
United States Magistrate Judge

Alexandria, Virginia

**(EXHIBIT J)**

**From:** John H. Snyder john@jhsnyderlaw.com  
**Subject:** Fwd: Proposed intervention into SDNY lawsuit  
**Date:** October 24, 2020 at 10:05 PM  
**To:** Jason Goodman jason@21stcentury3d.com

Look at this clown.

John H. Snyder PLLC | 555 Fifth Avenue, Suite 1700 | New York, NY 10017  
Tel: (212) 856-7280 | Cell: (917) 292-3081 | Web: [www.jhs.nyc](http://www.jhs.nyc)

This message and its attachments are sent from a law firm and may contain information that is confidential and protected by privilege from disclosure. If you are not the intended recipient, you are prohibited from printing, copying, forwarding or saving them. Please delete the message and attachments without printing, copying, forwarding or saving them, and notify the sender immediately. No waiver of any privilege is intended by this transmission.

To ensure compliance with requirements imposed by U.S. Treasury Regulations, John H. Snyder PLLC informs you that any U.S. tax advice contained in this communication (including any attachments) was not intended or written to be used, and cannot be used, for the purpose of (i) avoiding penalties under the Internal Revenue Code or (ii) promoting, marketing or recommending to another party any transaction or matter addressed herein.

----- Forwarded message -----

**From:** Spoliation Notice <[spoliation-notice@mailbox.org](mailto:spoliation-notice@mailbox.org)>  
**Date:** Sat, Oct 24, 2020 at 8:12 PM  
**Subject:** Proposed intervention into SDNY lawsuit  
**To:** [john@jhsnyderlaw.com](mailto:john@jhsnyderlaw.com) <[john@jhsnyderlaw.com](mailto:john@jhsnyderlaw.com)>, [samuel.eichner@finnegan.com](mailto:samuel.eichner@finnegan.com) <[samuel.eichner@finnegan.com](mailto:samuel.eichner@finnegan.com)>, [john@jhs.nyc](mailto:john@jhs.nyc) <[john@jhs.nyc](mailto:john@jhs.nyc)>, [margaret.esquenet@finnegan.com](mailto:margaret.esquenet@finnegan.com) <[margaret.esquenet@finnegan.com](mailto:margaret.esquenet@finnegan.com)>, [b.brett.heavner@finnegan.com](mailto:b.brett.heavner@finnegan.com) <[b.brett.heavner@finnegan.com](mailto:b.brett.heavner@finnegan.com)>, Spoliation Notice <[spoliation-notice@mailbox.org](mailto:spoliation-notice@mailbox.org)>

Ref: 1:20-cv-07269-VEC The National Academy of Television Arts and Sciences, Inc. et al v. Multimedia System Design, Inc.  
Valerie E. Caproni, presiding

To: Attorneys of Record

Jason Goodman has published another malicious, defaming and slanderous video podcast that references the undersigned and the surname "Sweigert".

<https://www.youtube.com/watch?v=BNP5rfZvSAs>

At the onset, I demand that counsel advise Jason Goodman to remove this offending video at once. After three (3) years of experience in dealing with Mr. Goodman the undersigned believes Goodman will not comply.

Therefore, the undersigned is left with no choice but to intervene in the above cited action pursuant to FRCP Rule 24 (see motion and memorandum for intervention).

As described by Goodman in para. 23 of the attached COUNTERCLAIM, Mr. Goodman has conflated the undersigned with NATAS before judge Valerie E. Caproni. These assertion are completely false, in error and near fraud.

D. George Sweigert





Why Are Social Engineers Connected to the Sweigert Brothers Obsessed with Me & Everything I Do?

1,800 views • Streamed live 111 minutes ago

153 27 SHARE SAVE



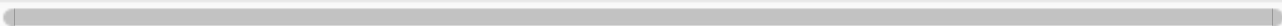
steele-vs-goodm...20.pdf



steele-vs-goodm...20.pdf



show\_temp-counte...im.pdf



**(EXHIBIT K)**

**From:** spoliation-notice@mailbox.org  
**Subject:** Litigation hold: R.D.S. v. Jason Goodman, 3:17-CV-00601 MHL  
**Date:** November 28, 2017 at 4:36 PM  
**To:** privacyinquiries@gotinder.com, copyright@match.com, help@gotinder.com  
**Cc:** truth@crowdsourcethetruth.org, georg.webb@gmail.com, spoliation-notice@mailbox.org, contact@unrig.net, humantrafficking@ocfs.ny.gov, uslawenforcement@google.com, nyspmail@troopers.ny.gov

---

TO: General Counsel, media service "TINDER"

Evidence Preservation and Anti-Spoliation Demand

Ladies and Gentlemen:

This litigation hold demand concerns the following TINDER user:

Jason Goodman  
252 7th Avenue, #6S  
New York, NY 10001

According to video materials posted on YouTube by "George Webb" and "Jason Goodman", contact was allegedly made by these two individuals with underage teenage girls on the platform TINDER.

In a separate video, the pair (Sweigert & Goodman) apparently discuss human trafficking in great detail. During the course of filming Webb brings up the TINDER accounts they both utilize and Goodman announced "CUT, CUT, CUT". This was taken to mean "stop filming".

Civil litigation has been brought against Mr. Goodman and includes allegations related to the foregoing information. See Robert David Steele (R.D.S.) in the subject line of this message.

This litigation demand requires that information contained in Mr. Goodman's account be preserved for litigation; whether or not contained in messages, membership applications, log files, audit trails, etc. Such evidence should include related account activity, two-ways message exchanges, images, etc.

As this matter may possibly border on issues of interest to law enforcement, appropriate agencies have been included in this evidence reservation demand.

Evidence Collection Team

**(EXHIBIT L)**

**From:** **Spoliation Notice** spoliation-notice@mailbox.org

**Subject:** Latest update on George Webb

**Date:** April 28, 2020 at 5:44 PM

**To:** legal@patreon.com, privacy@patreon.com, colin@patreon.com

**Cc:** Brittany.Custer@ic.fbi.gov, crimstatsinfo@ic.fbi.gov, NICS@ic.fbi.gov, iso@ic.fbi.gov, georg.webb@gmail.com, jason@21stcentury3d.com, truth@crowdsourcethetruth.org, jasongoodman72@protonmail.com

To whom it may concern:

Public statements of critique now orbit the Patreon subscribers known as George Webb and Jason Goodman.

As you know, a spoliation notice was sent to Patreon to safely collect and archive electronic account information concerning these subscribers as part of an evidence collection effort for pending litigation.

See below:

<https://sdny.news/2020/04/28/george-webb-vows-to-take-smear-machine-underground-to-continue-attacks-from-the-patreon-the-rogue-gallery-of-cyber-stalkers-while-secrets-of-jason-goodman-are-revealed-in-the-fear-mongering-wrec/>

D. George Sweigert

[www.sdny.org](http://www.sdny.org)

## Moving From YouTube To Patreon For Now

Thank you all for staying with me after the CNN smear. I will move away from YouTube and start only producing videos for Patreon for awhile until these unhinged lunatics stop making death threats, and we can get back to reporting. We have had several visits to the island here in Maryland by crazies taking my photo and following me, etc. I expect this will subside after the initial hate waves subside. I have deactivated my Twitter for now for the same reason. I plan on reactivating later, but for now, my ex-wife is very concerned about the safety of our children. You will see over the next few days what the background information I had, and how that dovetails NATO Couriers with bioweapons testing at Ft. Belvoir on unsuspecting soldiers. I HAVE NOT Dr. Redfield's illegal testing at Ft. Detrick, Bethesda Naval Hospital (formerly Walter Reed Army Hospital, Ft. Belvoir, and Ft. Belvoir Community Hospital, but I can assure you I have been researching the use of Pak ISI 111 to do this testing on behalf of a small cadre of ex-politicians and NATO military officers. I will do daily updates to keep you posted on our valuable research, most of which was confirmed by the CNN smear. Thank you again for staying with me.



**(EXHIBIT M)**

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION  
AT DETROIT**

<b>George Webb Sweigert,</b>	:	CASE
	:	
<b>Plaintiffs,</b>	:	NO.
	:	
<b>v.</b>	:	JUDGE
	:	
<b>CABLE NEWS NETWORK, INC.,</b>	:	PLAINTIFF'S COMPLAINT
	:	WITH
<b>Defendant.</b>	:	JURY DEMAND
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**NOW COMES** George Webb Sweigert (“George Webb Sweigert”), and by and through his own pro se counsel, and states his Complaint for Defamation against Cable News Network, Inc. (“CNN”) as follows:

**INTRODUCTION**

1. In 1980, Ted Turner defied skeptics and successfully founded CNN, the first 24-hour cable and satellite news channel.
2. For several years thereafter, CNN branded itself worldwide as “the most trusted name in news.”
3. CNN is now owned by Turner Broadcasting System, Inc., an American media conglomerate that is a division of Warner Media, LLC.
4. Warner Media, LLC is an American multinational mass media and entertainment conglomerate owned by AT&T, Inc. and headquartered in New

York City.

5. AT&T, Inc. is an American multinational conglomerate holding company headquartered in Dallas, Texas.

6. According to its 2018 Form 10-K filing and Annual Report, AT&T, Inc.'s 2018 operating revenue was \$170.756 Billion and its net income was \$19.953 Billion.

7. According to Time Warner Inc. n/k/a Warner Media, LLC's 2017 Form 10-K filing, CNN reached 91.4 million domestic households and more than 350 million households outside of the United States as of December 31, 2017.

8. In 2017, suffering from a public perception that it had deteriorated from being recognized as a source of hard news to being considered a mere echo chamber for manipulated and politicized commentary and "fake news," CNN launched a new branding campaign, "Facts First," which is pinned to the top of its Twitter social media page.

9. From at least as early as the November 2016 election of Donald J. Trump as the 45th President of the United States, CNN has maintained a well-known and easily documented biased agenda against President Trump and established a history of impugning individuals perceived to be supporters of the President.

10. Prior to January 2018, President Trump publicly and repeatedly branded CNN as the poster child of "fake news."

11. Between June 17th, 2017 and October 29th, 2019 at the time of this writing, CNN brought down the full force of its corporate power, influence, and wealth on George Webb Sweigert by falsely attacking, vilifying, and bullying

him despite the fact that he was simply a citizen journalist reporting on stories of worldwide interest and importance.

12. Contrary to its “Facts First” public relations ploy, CNN ignored the facts and put its anti-Trump agenda first in waging a three and a half year campaign of false, vicious attacks against George Webb Sweigert, a self financed, citizen journalist who had only contributed to the Presidential campaigns of Bernie Sanders in 2016.

13. CNN’s vicious attack on George Webb Sweigert included at least three (3) defamatory television broadcasts and forty two (42) months of continuous posting defamatory online articles falsely accusing George Webb Sweigert of being in a plot to create alarm in the Port of Charleston when he in fact was in Ohio covering a story of missing uranium and an eight way murder of every member of a uranium trucking company.

14. More specifically, CNN falsely asserted that George Webb Sweigert engaged in a deliberate attempt to create a news hoax in the Port of Charleston when in fact George Webb Sweigert had discounted these initial reports, and clearly contradicted them by saying any likely attack by the Pakistani terrorist Daewoo Ibrahim would occur at his main drug port, the US Naval Base in Norfolk, Virginia, not at the Port of Charleston.

15. Despite numerous attempts by George Webb Sweigert to CNN to correct the record, CNN has ignored these requests for forty two (42) months.

16. The CNN accusations are totally and unequivocally false and CNN would have known them to be untrue had it undertaken any reasonable efforts

to verify their accuracy before publication of its false and defamatory accusations.

17. CNN continued the attacks on Citizen Journalist, George Webb Sweigert, in June of 2020, making outlandish and false claims that somehow wished harm on the subjects of one of his news reports.

18. CNN ignored death threats provided by George Webb Sweigert to CNN Reporter, Donie O'Sullivan, clearly showing a Navy veteran from the US Naval Base in Norfolk, Virginia had threatened to "Waco" and "Jonestown" George Webb Sweigert's family.

19. CNN and Reporter Donie O'Sullivan also ignored text messages from Ken Hale, a Navy Veteran and former official with the US State Department, threatening he was "five minutes away" multiple times on a Saturday evening from the home of George Webb Sweigert's home in Maryland at that time.

20. CNN and CNN Reporter Donie O'Sullivan also ignored text messages provided to Donie O'Sullivan sent by Ken Hale threatening to "flamethrower" the family of George Webb Sweigert.

21. CNN made no acknowledgment of these death threat texts and message made directly to George Webb Sweigert in its June 2020 reporting about him.

22. CNN and Reporter Donie O'Sullivan recklessly endangered the life of George Webb Sweigert and his family by outrageously and falsely twisting the death threats to him by reporting somehow George Webb Sweigert was wishing ill on the subjects of his March 2020 reporting.

23. George Webb Sweigert clearly cast the subject of his March 2020 as victims of the CoronaVirus while in China for the 2019 NATO Military Games.

24. CNN repeatedly defamed George Webb Sweigert with false claims that he encouraged bullying of the October 2019 NATO Military Games CoronaVirus victims in national television broadcasts with anchors Jim Sciutto, Poppy Harlow, and Brian Seltzer.

25. Contrary to CNN's repeated false reports, George Webb Sweigert presented all the CoronaVirus victims from the October 2019 NATO Military Games as victims including French Gold Medalist Elodie Clouvel and her fiancé on the Dutch NATO Team. The Italian NATO Team victims were also accurately presented as victims.

26. CNN rushed to incite a viral social media mob to further its anti-Trump agenda and increase the billion-dollar bottom lines of its conglomerate corporate owners by generating eyeballs, clicks, and resulting advertising revenue from its sensationalized broadcasts and online reporting.

27. According to media reports, CNN's high primetime viewership of the reports on George Webb Sweigert as a "harasser".

28. CNN elevated false, heinous accusations of the alleged "harassment" conduct of George Webb Sweigert in a national broadcast on October 28th, 2020 from social media to its worldwide news platform without adhering to well-established journalistic standards and ethics, including its failure to take the required steps to ensure accuracy, fairness, completeness, fact-checking, neutrality, and heightened sensitivity when dealing with a minor.

29. Exposing the shallowness of its “Facts First” public relations branding ploy, CNN got the “Facts Last” as it repeatedly, recklessly, and willfully violated basic, fundamental standards of journalistic integrity.

30. CNN’s agenda-driven fiction about George Webb Sweigert about this March 2020 reporting was not only false and defamatory, it created an extremely dangerous situation by knowingly triggering the outrage of its audience and unleashing that outrage on George Webb Sweigert with its patently false accusations that George Webb Sweigert somehow wished harm on the subjects of his factual reports.

31. CNN anchors and news personnel openly called for “acts of outrage” against George Webb Sweigert, furthering the mob frothing to its false narratives.

32. With its most recent reports in October of 2020, CNN’s wanton reporting has now move from outrageous misrepresentation and slander to reckless endangerment for the lives of George Webb Sweigert and his family.

33. Rather than publicly retracting its false, defaming reports about George Webb Sweigert, CNN willfully chose to amplify this dangerous and reckless behavior in a worldwide broadcast on October 28th, 2020.

34. George Webb Sweigert was an easy target for CNN to advance its anti-Trump agenda because he was a Bernie Sanders supporter who had turned to Trump after his lawsuit against the DNC was mooted by a plea deal of a key DNC operative.

35. In addition to its substantial broadcast television and online audience,

CNN republished many of its false and defamatory broadcasts and articles to its over 41 million Twitter followers.

36. In order to fully compensate George Webb Sweigert for the reputation harm, emotional distress, and mental anguish caused by CNN's false attacks, this action seeks compensatory damages in excess of Fifty Million Dollars (\$55,000,000.00).

37. In order to punish and to deter CNN from ever again engaging in false, reckless, malicious, and agenda-driven attacks against citizen journalists in violation of well-

recognized journalistic standards and ethics, this action seeks punitive damages in excess of One Hundred Million Dollars (\$100,000,000.00).

**DETAILED FACTUAL BACKGROUND OF  
REPORTING BY GEORGE WEBB  
SWEIGERT IN PIKETON OHIO JUNE 2017**

38. George Webb Sweigert met with two independent sources on June 14th, 2020 to confirm and cross-reference a story about missing uranium from the US Enrichment Uranium Plant in Piketon, Ohio.

39. George Webb Sweigert endeavored to meet with a third independent source before he was arrested.

40. George Webb Sweigert was tracked and his cell phone was repeatedly pinged by the FBI on the afternoon of June 14th, 2020.

41. George Webb Sweigert had no idea the first informant he met with for several hours, Marshall Okey Richards, was in fact an FBI Informant. Richards



played a key role in the entrapment of several residents of West Virginia and Ohio by encouraging them to take bomb making classes in previous years.

42. The second informant George Webb Sweigert met with on June 14th, 2020 reported that the uranium trucking company he was investigating in Piketon, Ohio (where every member of the company was murdered in a gruesome eight-way murder), was actually an industrial drug operation run by the Rhoden Trucking family.

43. CNN never reported a correction to their grossly misleading story that George Webb Sweigert had somehow been the source of the information himself, even after FBI Marshall Okey Richards was outed in the media.

44. CNN was informed numerous times in dozens of online broadcasts and requests to correct their reporting that somehow George Webb Sweigert had generated the story. The second information source is a former law enforcement officer who was present as George Webb Sweigert took five calls from DHS and Port of Charleston officials in trying to understand which DNC operative had shipped four diplomatic containers to the Port.

45. Despite dozens of requests to correct the record, CNN and Reporter Donie O'Sullivan callously refused to correct the story that an FBI Informant was the actually source of the story, and that George Webb Sweigert had been entrapped.

46. CNN has shown willful disregard for the truth by even the most minimal journalist standard by allowing this false "Port of Charleston hoax" narrative to continue.

47. Instead of trying to contain the irreparable harm their grossly

misleading story about the Port of Charleston, CNN and Reporter Donie O'Sullivan chose to willfully compound the damage by making George Webb Sweigert the target of yet another CNN attack in June of 2020.

**REPORTING GEORGE WEBB SWEIGERT IN March 2020**

48. In March of 2020, George Webb Sweigert correctly reported that Chinese Foreign Minister Spokesman Jian brought CoronaVirus to Wuhan at the US Military Athletes at the October 2019 NATO Military Games.

49. George Webb Sweigert was not aware of the Harvard CoronaVirus Study placing the outbreak in Wuhan, China in August of 2019 at the time of the reporting.

50. George Webb Sweigert received information at a news gathering event that Ft. Belvoir Community Hospital in Virginia had an outbreak in September of 2019 and Detrick, Maryland area hospitals and nursing homes had a CoronaVirus outbreak in August of 2019 near the bioweapons facility in Ft. Detrick Maryland.

51. George Webb Sweigert had been informed in January of 2019 by a doctor at the Ft. Belvoir facility that voluntary testing sometimes occurred both facilities of “mock” or “low intensity” viruses to test treatments and vaccines.

52. At a news gathering event of ten citizen journalists, the number of athletes that could have been infected at Ft. Belvoir Community Hospital that also attended the Wuhan NATO Military Games in October 2019 was just one person, a Dutch National woman cyclist with a background as a driver for the Supreme NATO Allied Commander.

53. In a working news gathering event with ten people, the name of the Dutch NATO driver was put on a whiteboard, and her employment at Ft. Belvoir Community Hospital was confirmed. George Webb Sweigert only speculated this Dutch NATO driver was a possible victim at this event, and unknowingly been “patient zero”. During this time of intense tension between the United States and China with each side blaming the other for the CoronaVirus, this effort seemed to be the only logical and helpful discussion occurring in the News universe to reduce the name calling and assignment of blame.

54. Instead of lauding this logical epidemiology approach to actually solving and tracing the CoronaVirus crisis, CNN and Reporter Donie O’Sullivan chose to jump on the attack of Citizen Journalist, George Webb Sweigert yet again. Even after evidence was produced that the Dutch courier was indeed Dutch, had been a driver for the Supreme Allied Commander of NATO, and was indeed employed at Ft. Belvoir Community Hospital for CNN Reporter Donie O’Sullivan, instead of responsibly reporting these facts, he and CNN willfully choose to suppress this information from the American people. To compound these gross errors of omission, CNN and Reporter Donie O’Sullivan chose to simply say there was no evidence presented to them.

55. Even after the Chinese Foreign Minister specifically requested the medical records of the Dutch cyclist with the NATO High Command experience, CNN and Reporter Donie O’Sullivan continue to push the false narrative their was not evidence and no attempt at fair and balanced journalist by George

Webb Sweigert, causing yet more irreparable harm and defamation.

54. After dozens of outreaches to the subjects of the story, many of the outreaches broadcast around the world, the subjects of the story remained only in close consult with CNN and Reporter Donie O'Sullivan.

55. Given CNN's prior misrepresentations and denials of responsibility for correction for the previous 42 month, a reasonable person would expect some modicum of journalistic inquiry to avoid their egregious earlier, uncorrected errors. But the exact opposite behavior was demonstrated by CNN and Reporter Donie O'Sullivan in June 2020 with an irresponsible amplification of previous false narratives about George Webb Sweigert.

56. CNN not only unleashed a mob a revenge minded internet trolls to descend on George Webb Sweigert's YouTube Channel, but they actively lobbied the removal of his channel to deprive him any means of rebuttal against the CNN Media Giant.

57. YouTube responded to CNN pressure by destroying four years of journalistic work that included tens of thousands of source citations that would fill seven Gutenberg Bibles at last count.

58. Instead of taking a sober assessment of the irreparable damage they had done to George Webb Sweigert's career and life's work, CNN and Reporter Donie O'Sullivan actively conspired with internet trolls to intensify the damage caused.

59. CNN and Reporter Donie O'Sullivan continues this character assassination scheme up to one week before the US Presidential Election with yet another false and misleading attack on George Webb Sweigert

on October 28th, 2020.

60. CNN and Reporter Donie O'Sullivan continue to promote their misrepresentations and defamation of George Webb Sweigert to the very minute of this writing, and CNN and Reporter Donie O'Sullivan show now signs of abating their actions.

61. At all times, George acted respectfully, responsibly, appropriately, and in a manner consistent with the values instilled upon him by his family and his faith.

### **THE CNN COVERAGE**

62. The CNN attacks on citizen journalism can be understood if one looks at the money mad history of CNN and their continual choice over targeting innocents to dogwhistle their base of rabid followers in deference to journalistic integrity. When view through the lens of false narratives leading to rapacious profits, their contemptible behavior is at least understandable.

63. Given this egregious behavior by CNN, a reasonable person might expect CNN and Reporter Donie O'Sullivan would be rushing to issue a retraction or a statement of contrition regarding its wanton targeting of a citizen journalist who was just trying to tell the truth. But, what my not surprise the Court by this point in the Complaint, CNN nor Donie O'Sullivan have never to the date of the filing of this Complaint issued a formal retraction, correction or an apology to George Webb Sweigert.

### **PARTIES, JURISDICTION, AND VENUE**

64. George Webb Sweigert now resides in Monroe County, Michigan.

65. George Webb Sweigert has been a self finance journalist for the last four years, and before that he was a network analyst.

66. CNN is a foreign corporation existing under the laws of the State of Delaware with its principal place of business being located at One CNN Center, Atlanta, Georgia 30303. CNN may be served by delivery of a copy of the summons and complaint to its duly-appointed registered agent, the Corporation Trust Company, Corporation Trust Center, 1209 Orange Street, Wilmington, Delaware 19801.

67. There exists complete diversity of citizenship between Plaintiffs and CNN.

68. The amount in controversy greatly exceeds Seventy-Five Thousand Dollars (\$75,000.00), exclusive of interests, costs, and attorneys' fees, as required to sustain subject-matter jurisdiction in this Court.

69. This Court has subject-matter jurisdiction over this matter pursuant to  
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U.S.C. § 1332(a).

70. CNN is the nation's first cable news network and remains a fixture of cable

news – both nationally and internationally.

129. CNN transacts business in the State of Michigan, including through the distribution of its content through cable television and the Internet, and CNN committed the tortious acts identified herein in the State of Michigan.

130. CNN published the broadcasts and online articles identified herein in the State of Michigan.

131. CNN has intentionally sought and obtained benefits from their tortious acts in the State of Michigan.

132. CNN directed its conduct at George Webb Sweigert, a citizen of Michigan.

133. George suffered substantial reputational and emotional harm in this District.

134. There is a reasonable and direct nexus between CNN's tortious conduct in

Michigan and the harm suffered by George Webb Sweigert in Michigan and beyond.

135. CNN is subject to the jurisdiction of this Court.

136. Venue is proper in this District pursuant to 28 U.S.C. § 1391(b) because the CNN is subject to personal jurisdiction in this District and/or a substantial part of the events giving rise to this claim occurred in this District, including publication and injury.

#### **CAUSE OF ACTION FOR DEFAMATION**

137. George reasserts and incorporates by reference paragraphs 1 through 136 of this Complaint as if fully restated herein.

138. CNN published to third parties without privilege no less than three (3) false and defamatory television broadcasts, three (3) false and defamatory

Internet articles, and three (3) false and defamatory tweets of and concerning George Webb Sweigert.

139. As late as October 28th, 2020, CNN and Reporter Donie O'Sullivan posted on its Twitter page and published to approximately 41 million followers false and defamatory gists of their previous defamations of George Webb Sweigert.

140. These tweets are collectively referred to herein as the "Tweets."

141. The Tweets, Broadcasts, and Articles are collectively referred to herein as the "False and Defamatory Accusations." As the natural and foreseeable consequence of its actions, CNN knew and intended that its False and Defamatory Accusations would be republished by others, including media outlets and others on social media.

### **George IS A CITIZEN JOURNALIST**

142. George Webb Sweigert has a right to Freedom of Speech and Freedom of the Press guaranteed by the Constitution.

143. George Webb Sweigert has always made a practice of fast and very public retractions if every pointed to be in error of a story.

144. George Webb Sweigert does not take money for large corporate advertisers looking for journalists who will look the other way to their transgressions.

145. George Webb Sweigert does not promulgate conspiracy theories like Donald Trump being the agent of Russia as CNN and Reporter Donie O'Sullivan have done like clockwork that last four years.

146. George Webb Sweigert has a reasonable expectation to be protected by the rights guaranteed by the US Constitution and relevant State Law.



**CNN PUBLISHED NEGLIGENTLY AND  
MALICIOUSLY**

**CNN published its False and Defamatory  
Accusations negligently and with actual knowledge  
of falsity or a reckless disregard for the truth.**

147. As one of the world's leading news outlets, CNN knew but ignored the importance of verifying damaging and, in this case, incendiary accusations against a citizen journalist prior to publication.

148. Instead, CNN recklessly rushed to publish its False and Defamatory Accusations in order to advance its own political agenda against President Trump.

149. In doing so, CNN lifted the incident from social media and placed it in the mainstream media, giving its False and Defamatory Accusations credibility and permanence.

150. CNN negligently published its False and Defamatory Accusations by departing from the reasonable standard of care employed by journalists, including those standards articulated by the Society of Professional Journalists' Code of Ethics.

151. CNN's collective conduct demonstrates a purposeful avoidance of the truth and the publication of the False and Defamatory Accusations with actual knowledge of falsity following its review of the complete video evidence and George's statement no later than January 20.

152. CNN negligently and recklessly published its False and Defamatory Accusations by failing to conduct a reasonable investigation prior to

publication.

153. CNN's duty to investigate is heightened where, as here, where the June 2020 and October 2020 CNN Reporting compounded the injury.

154. CNN negligently and recklessly published its False and Defamatory Accusations by relying on unreliable and biased sources with questionable credibility.

155. CNN negligently and recklessly published its False and Defamatory Accusations by failing to conduct a reasonable investigation, including by relying on unreliable sources for its publications.

156. Indeed, CNN conducted no interviews of George Webb Sweigert's sources.

157. CNN consciously elected to ignore this contrary information in favor of its pre-conceived false narrative against President Trump and his supporters.

158. CNN negligently and recklessly failed to consult publicly available information demonstrating its False and Defamatory Accusations to be false, including, without limitation, other video evidence available online demonstrating the steadfast journalistic discipline of George Webb Sweigert.

159. In fact, upon information and belief, prior to publishing any of its False and Defamatory Accusations, CNN knew that its defamations were the result of FBI Informants planting false information with George Webb Sweigert. But CNN wholly omitted and otherwise contradicted this information.

160. CNN continued to publish its False and Defamatory Accusations with actual knowledge of falsity, having reviewed video evidence and statements of

George Webb Sweigert contradicting its False and Defamatory Accusations.

161. CNN negligently and recklessly failed to seek information from other obvious sources who were present at the January 18 incident and would have demonstrated its False and Defamatory Accusations to be false, including George Webb Sweigert, and upon information and belief, his wealth of video documentation proving his journalistic integrity.

162. CNN negligently and recklessly published its False and Defamatory Accusations despite internal inconsistencies in despite uncovering information which corroborated George Webb Sweigert's reporting.

163. CNN negligently and recklessly published its False and Defamatory Accusations in derogation of accepted principles of journalistic ethics, including by failing to use heightened sensitivity when dealing with citizen journalists.

164. CNN negligently and recklessly published its False and Defamatory Accusations in derogation of accepted principles of journalistic ethics, including by failing to verify each before publication.

165. CNN negligently and recklessly published its False and Defamatory Accusations in derogation of accepted principles of journalistic ethics, including by failing to avoid stereotyping.

166. CNN negligently and recklessly published its False and Defamatory Accusations in derogation of accepted principles of journalistic ethics, including by failing to examine the way in which its own biases and agenda shaped its false reporting.

167. CNN negligently and recklessly published its False and Defamatory

Accusations in derogation of accepted principles of journalistic ethics, including by failing to treat George Webb Sweigert as a human being deserving of respect.

168. CNN negligently and recklessly published its False and Defamatory Accusations in derogation of accepted principles of journalistic ethics, including by wrongfully placing the anti-Trump agenda over the harm its False and Defamatory Accusations caused irreparable harm to George Webb Sweigert.

169. Upon information and belief, at the time of its initial reporting of and concerning George, CNN did not know George' age and did not make any reasonable attempt to ascertain it despite the general knowledge that George Webb Sweigert was being misled by FBI Informants.

170. CNN's actual malice is further evidenced by its failure to retract its False and Defamatory Accusations.

171. CNN published its False and Defamatory Accusations with common law malice, including because it intended to harm George Webb Sweigert because his was a disaffected support of the Democratic Party and consciously ignored the threats of harm that it knew would inevitably ensue, in favor of its political agenda.

172. CNN published its False and Defamatory Accusations with common law malice, demonstrated by its failure to retract its False and Defamatory Accusations despite the harm and danger it knew would be inflicted upon George Webb Sweigert.

173. CNN published its False and Defamatory Accusations with common law malice, including because it callously ignored the consequences of its

actions upon a citizen journalist.

174. CNN's common law malice is further evidenced by its failure to reprimand Reporter Donie O'Sullivan for his cyber-assault of George on Twitter.

### **DAMAGES**

175. The publication of the False and Defamatory Accusations directly and proximately caused substantial and permanent damage to George Webb Sweigert.

176. The False and Defamatory Accusations were republished by third-parties and members of the mainstream and social media mob, which was reasonably foreseeable.

177. The False and Defamatory Accusations against George Webb Sweigert are defamatory per se, as they are libelous on their face without resort to additional facts, and as clearly demonstrated here, George Webb Sweigert was subjected to public hatred, contempt, scorn, obloquy, and shame.

178. As a direct and proximate result of the False and Defamatory Accusations, George Webb Sweigert suffered permanent harm to his reputation.

291. As a direct and proximate result of the False and Defamatory Accusations George Webb Sweigert suffered severe emotional and mental distress.

292. As a direct and proximate result of the False and Defamatory Accusations George Webb Sweigert is forced to live his life in a constant state of concern over his safety and the safety of his family.

293. CNN published its False and Defamatory Accusations with actual malice and common law malice, thereby entitling George Webb Sweigert to an award of punitive damages.

294. CNN's conduct was outrageous and willful, demonstrating that entire want of care that raises a conscious indifference to consequences.

295. George Webb Sweigert is entitled to an award of punitive damages to punish CNN and to deter it from repeating such egregiously unlawful misconduct in the future.

**WHEREFORE**, George Webb Sweigert respectfully prays:

(a) That judgment be entered against CNN for substantial compensatory damages in an amount not less than Fifty Million Dollars (\$50,000,000.00);


(b) That judgment be entered against CNN for punitive damages in an amount not less than One Hundred Million Dollars (\$100,000,000.00);

(c) That George recover his reasonable attorneys' fees and expenses from CNN;

(d) That all costs of this action be taxed to CNN; and

(e) That the Court grant all such other and further relief that the Court deems just and proper, including equitable relief.

Respectfully submitted this 30th day of October, 2020.

A handwritten signature in black ink, reading "George Sweigert". The signature is written in a cursive style with a large, prominent "G" and "S".

**George Webb Sweigert**

George Webb Sweigert (pro se)  
Georg.webb@gmail.com

1671 W. Stearns Road, Suite E  
Temperance, MI 48182  
Tel: 503-919-0748

**(EXHIBIT N)**



12

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
Southern Division

George Webb Sweigert,

Plaintiff,

-against-

CASE: 2:20-cv-12933-GAD-KGA

Cable News Network

Defendant.

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**Movant**

**D. G. SWEIGERT, C/O  
GENERAL DELIVERY  
ROUGH AND READY, CA  
95975**

**Spoliation-notice@mailbox.org**

**Plaintiff**

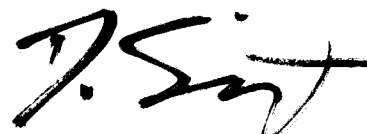
**George Webb Sweigert  
1671 W. Stearns Road, Suite E  
Temperance, MI 48182  
Tel. 503-919-0748  
Georg.webb@gmail.com**

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**MOTION FOR CHANGE OF VENUE BY  
INTERVENOR-APPLICANT PARTY OF INTEREST**

NOW COMES D. GEORGE SWEIGERT, *pro se* non-attorney intervenor-applicant and party in interest, to urge this court to use it's inherent powers to bring a motion upon it's own authority to transfer the venue of this instant lawsuit for improper venue (Mich. R. Civil. Proc. 2.223) to the Southern District of New York (S.D.N.Y.), where related litigation has been progressing for two and a half (2.5) years on these matters.

Respectfully submitted on this 7 day of November 2020.



**D. G. SWEIGERT, C/O  
GENERAL DELIVERY  
ROUGH AND READY, CA 95975  
Spoliation-notice@mailbox.org**

7-11-20

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
Southern Division**

George Webb Sweigert,

Plaintiff,

-against-

**CASE: 2:20-cv-12933-GAD-KGA**

Cable News Network

Defendant.

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**Movant**

**D. G. SWEIGERT, C/O  
GENERAL DELIVERY  
ROUGH AND READY, CA  
95975**

**Spoliation-notice@mailbox.org**

**Plaintiff**

**George Webb Sweigert  
1671 W. Stearns Road, Suite E  
Temperance, MI 48182  
Tel. 503-919-0748  
Georg.webb@gmail.com**

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**MOVANT'S BRIEF IN SUPPORT OF  
MOTION FOR CHANGE OF VENUE BY  
INTERVENOR-APPLICANT PARTY OF INTEREST**

For the reasons detailed below, this Court should issue an advisory opinion with the practical effects of transferring this case to the Southern District of New York (S.D.N.Y.).

### **INTRODUCTION**

NOW COMES D. GEORGE SWEIGERT, *pro se* non-attorney intervenor-applicant and party in interest, to urge this court to use its inherent powers to bring a motion upon its own authority to transfer the venue of this instant lawsuit for improper venue (Mich. R. Civil. Proc. 2.223) to the Southern District of New York (S.D.N.Y.), where related litigation has been progressing for over two and a half (2.5) years. Plaintiff is listed as a “third party defendant” in S.D.N.Y. which shares common fact and questions of law with this instant lawsuit. The undersigned believes permissive intervention is appropriate pursuant to Fed. R. Civ. Proc. Rule 24(B) as there are common questions of law and fact. The Court may rely on a decision in the District of South Carolina to transfer a similar lawsuit to the S.D.N.Y. (see *Sweigert v. Goodman*, No. 2:2018cv01633 - Document 27 (D.S.C. 2018) (08-29-2018)). That case was transferred from South Carolina to the S.D.N.Y. and has now become 1:18-cv-08653-VEC-SDA *Sweigert v. Goodman* (Hon. Valerie Caproni), in which “George Webb Sweigert” is listed as a “third-party defendant”. There are many overlapping commonalities of this instant litigation with other lawsuits in the S.D.N.Y. The Defendant (CNN) maintains a business office at 30 Hudson Yards, New York, NY 10001 within the S.D.N.Y.

### **FACTUAL BACKGROUND**

1. At the outset, the undersigned apologizes for the length of the following explanations that are required to support the legal rational to change the venue of this instant lawsuit.
2. The undersigned, movant D. George Sweigert, has known the Plaintiff for over fifty years and comes before this Court in the capacity of an intervenor-applicant and party-in-interest.

The undersigned seeks this Court's permissive intervention of a limited nature pursuant to Fed. R. Civ. Proc. Rule 24 to support judicial economy.

3. The Plaintiff (George Webb Sweigert) is a self-styled social media podcast journalist who has lived for the last three years of his life almost exclusively in the State of Maryland, he is not a resident of Michigan but a tourist. In social media podcasts the Plaintiff has proclaimed he has been in Michigan about six weeks.

4. While in Maryland the Plaintiff filed three (3) similar lawsuits in the U.S. District Court for the District of Columbia. All these actions have been dismissed without prejudice, most with defense counsel seeking Fed. R. Civ. Proc. Rule 11 financial sanctions. See *Sweigert v. Perez*, 334 F. Supp. 3d 36, 42 (D.D.C. 2018).

5. Plaintiff's allegations orbit two news media stories published by Defendant CNN on **June 16, 2017 and April 29, 2020**. These two news media stories create bookends for a 6/16/2017 to 4/29/20 time-line. These news stories are relevant to litigation pending in the S.D.N.Y. In sum, the June 16, 2017 story involves Jason Goodman, New York City, N.Y. and the April 29, 2020 news story involves **Miss Corean Elizabeth Stoughton** of Hanover, Maryland (aka "DEEP NSA").

6. Nearly all the events described in the original complaint (Dkt. 1) involve witnesses located on the east coast to include Mr. Goodman, the Plaintiff's former business associate. and Miss Stoughton, a named witness in said litigation.

7. Miss Stoughton is the former girlfriend of the Plaintiff (14 months) who has maintained contact with Mr. Goodman, with who the Plaintiff lived with for about three (3) months in the Chelsea section of Manhattan, New York in the Spring of 2017 (in the residence of Goodman). Goodman operates the "CrowdSource The Truth" (CSTT) YouTube conspiracy channel (see

CNN article, 06/16/2017 [below]). This channel featured the Plaintiff when events described in the complaint (Dkt. 1) took place (see para.s 38 – 47).

8. Miss Stoughton was a social media side-kick of the Plaintiff that used the moniker “**DEEP NSA**” to post numerous blog entries in harmony with the Plaintiff. Miss Stoughton was the alleged “confidential” source of materials allegedly given to the Defendant that were obtained in an alleged clandestine manner (Stoughton’s fishing expeditions to locate e-mail messages in the Plaintiff’s e-mail accounts for which she had access).

9. Ms. Stoughton informed the undersigned that she reviewed, read, analyzed, and forwarded Plaintiff’s e-mail messages allegedly to the Defendant (CNN). Generally described in Plaintiff’s complaint in para.s 48 – 61 [note double para. 55] (Dkt. 1).

10. Ms. Stoughton also admitted that she maintained intense contact with the subject of the CNN story about the 2019 Chinese Military Olympic Games – **U.S. Army reservist SSgt. Maatje Banassi**, see Plaintiff’s complaint para.s 23,24 & 25 (Dkt. 1) and below.

The image is a screenshot of a CNN Business news article. At the top, the CNN Business logo is visible, along with navigation links for Markets, Tech, and a search bar. The time 05:45 is displayed. The main headline reads: "Exclusive: She's been falsely accused of starting the pandemic. Her life has been turned upside down". Below the headline, the byline states: "Story by Donle O'Sullivan, CNN Business", "Video by Richa Naik and John General, CNN Business", and "Photographs by Heather Fulbright, CNN". The article is dated "Updated 10:17 AM ET, Mon April 27, 2020". The text of the article begins: "Maatje Benassi, a US Army reservist and mother of two, has become the target of conspiracy theorists who falsely place her at the beginning of the coronavirus pandemic, saying she brought the disease to China." The next paragraph states: "The false claims are spreading across YouTube every day, so far racking up hundreds of thousands of apparent views, and have been embraced by Chinese Communist Party media. Despite never having tested positive for the coronavirus".

Story by Donie O'Sullivan, CNN Business

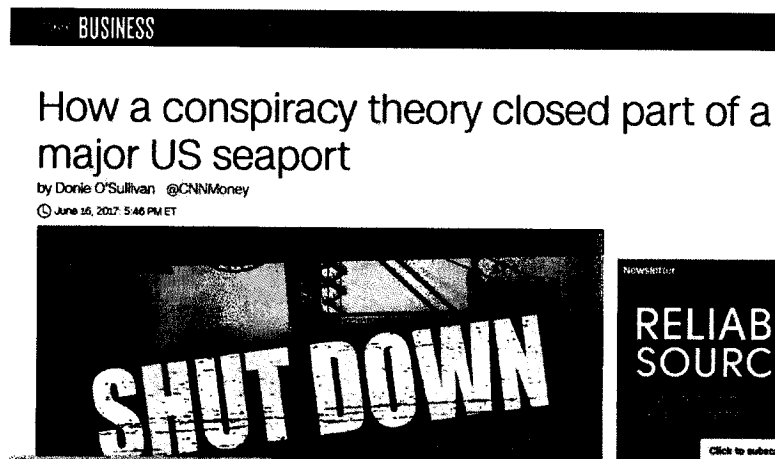
Video by Richa Naik and John General, CNN Business

Photographs by Heather Fulbright, CNN

Updated 10:17 AM ET, Mon April 27, 2020

Maatje Benassi, a US Army reservist and mother of two, has become the target of conspiracy theorists who falsely place her at the beginning of the coronavirus pandemic, saying she brought the disease to China.

11. Since June 14<sup>th</sup>, 2018, the undersigned has been a plaintiff in litigation (S.D.N.Y., 1:18-cv-08653-VEC-SDA *Sweigert v. Goodman*). The origins of the S.D.N.Y. litigation is the supposed “dirty bomb hoax” of June 14<sup>th</sup>, 2017 at the Port of Charleston, S.C. See *Sweigert v. Goodman*, No. 2:2018cv01633 - Document 27 (D.S.C. 2018) (08-29-2018). See Plaintiff’s complaint para. 13, 14 & 15 and para.s 38 – 47 (Dkt. 1).
12. Plaintiff’s para.s 18, 19 & 20 discuss “Donie O’Sullivan” of Defendant CNN, the author of the two news media article discussed above and below (04/27/2020 and 06/16/2017, respectively). It is noteworthy that Mr. Goodman was also featured in the news articles published by the Defendant (CNN), along with the Plaintiff on approximately June 16, 2017 (see below).



How a conspiracy theory closed part of a major US seaport

by Donie O'Sullivan @CNNMoney June 16, 2017: 5:46 PM ET

“[Plaintiff] Webb's allegations were broadcast on "Crowdsource the Truth," a conspiracy theory YouTube channel with a relatively modest 11,000 subscribers. Two other people appeared on-screen with Webb, all remote of one another -- Webb said he was in Ohio. Throughout, the trio read and responded to live comments from their audience -- which reached 2,000 viewers at some points, according to one of the hosts.”

13. Plaintiff's para.s 38, 40, 45 & 46 (with wrong date of June 14, 2020 and not the correct date of June 14, 2017) discusses the events leading up to the closure of the Port of Charleston, S.C. via the “dirty bomb hoax” as a result of the “CrowdSource The Truth” (CSTT) podcast with Jason Goodman. At para. 39 Plaintiff describes his arrest in Ohio for which Mr. Goodman flew to Ohio from New York to make bail for the Plaintiff. Mr. Goodman then purchased airline tickets for the pair to return to New York (Chelsea neighborhood). Generally covered in Plaintiff's complaint para.s 38 – 47 (Dkt. 1).

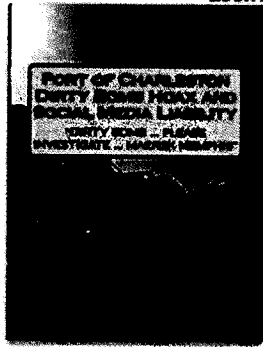
14. Plaintiff's para.s 42 and 43 describes his interactions with “Oakey Marshall Richards” (OMR) the source of the rumor that a uranium dirty bomb was present at the Motor Vessel MEMPHIS MAERSK as it arrived in the Port of Charleston. Generally, Plaintiff's para.s 38 through 47 address the “dirty bomb hoax” issues.

15. The Plaintiff reported this information on a live CSTT broadcast with Mr. Goodman on 06/14/2017, who amplified the information and instructed his (Goodman's) CSTT audience members to tweet dire warnings to the U.S. Coast Guard 7<sup>th</sup> District Headquarters in Miami, Florida. The tweet was “DIRTY BOMB .. MEMPHIS MARK .. PLEASE INVESTIGATE”. The Wando Marine terminal was closed shortly thereafter for eight (8) hours, a full nuclear

bomb public safety response was then executed involving over twenty (20) various federal and state agencies.

16. Mr. Goodman maintained an eight-month relationship with Oakey Marshall Richards (OMR) (who is cited by the Plaintiff in paras. 41 and 43) following the “dirty bomb hoax”. OMR became the podcast character “Rock Hudson” and completed approximately 33 podcast shows with Mr. Goodman.

17. These events have been documented in the undersigned’s book available on AMAZON.com (see below).



Look inside ↴

### Report: The Port of Charleston Dirty Bomb Hoax and Social Media Liability Paperback – April 14, 2018

by Dave Sweigert (Author)

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The only report that has ever been written about the Port of Charleston, S.C. Dirty Bomb Hoax of June 14, 2017. This booklet describes how social media hoax news sites can attack America's critical infrastructure. Seemingly, these deception merchants operate with no threat of legal action. This fertile environment has allowed the consequence-free attacks on maritime ports, generation of hysteria of supposed assassination plots, and generate fear over unsafe consumer products. The next generation of cyber-attack tools will be based upon Artificial Intelligence and can execute complex social media attacks. Law enforcement is falling further behind the



tip of the spear in comprehending the cyber warfare nature of these attach techniques.

### **LAW AND ARGUMENT**

18. The status of the undersigned may not be sufficient to sustain intervention pursuant to Fed. R. Civ. Proc. Rule 24(B) for permissive intervention. Nonetheless, the undersigned has determined that making to Court aware of the foregoing facts may enable the Court to consider on its own initiative to conduct an analysis if venue is proper or improper. In this instant lawsuit venue is believed to be improper. *Stewart Org., Inc. v. Ricoh Corp.*, 487 U.S. 22, 29–30 (1988).

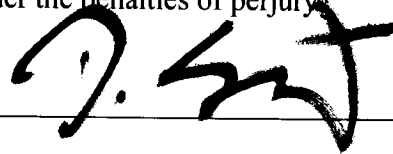
19. The Eastern District of Michigan has no connection with the foregoing described events – save for the “forum shopping” of the Plaintiff who is presently a non-resident tourist in this state.

20. The relief requested by the undersigned “should be regarded as a federal judicial housekeeping measure, . . . generally intended, on the basis of convenience and fairness, simply to authorize a change of courtrooms,” *Martin v. Stokes*, 623 F.2d 469 (6th Cir. 1980).

### **CONCLUSION**

The *pro se* non-attorney intervenor-applicant and party in interest urges this Court to use its inherent powers to bring a motion upon its own authority to transfer the venue of this instant lawsuit for improper venue (Mich. R. Civil. Proc. 2.223) to the Southern District of New York (S.D.N.Y.), where related litigation has been progressing for over two and a half (2.5) years.

I hereby attest that the foregoing is true and accurate under the penalties of perjury.



D. G. SWEIGERT, C/O  
GENERAL DELIVERY  
ROUGH AND READY, CA 95975  
Spoliation-notice@mailbox.org

7.11.20

### CERTIFICATE OF SERVICE


I, hereby certify, under penalties of perjury, that a true copy of the accompanying documents has been sent via First Class U.S. Mail on this 1 day of November, 2020 to:

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George Webb Sweigert  
1671 W. Stearns Road,  
Suite E  
Temperance, MI 48182

Tel. 503-919-0748  
Georg.webb@gmail.com

I hereby attest that the foregoing is true and accurate under the penalties of perjury.



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